UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Patricia W. Holden

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and

Richard P. Schroeter Jr. (pro hac vice pending)

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Counsel for Foundations Worldwide, Inc.

In re:

BED BATH & BEYOND, INC., et al., 1

Debtor.

Michael Goldberg, as Plan Administrator for 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.),

Plaintiff,

v.

Foundations Worldwide, Inc.,

Defendant.

Chapter 11

Case No. 23-13359-VFP

(Jointly Administered)

Adv. No. 24-01361-VFP

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at https://restructuring.ra.kroll.com/bbby. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

APPLICATION FOR PRO HAC VICE ADMISSION OF RICHARD P. SCHROETER JR.

Pursuant to Local Rule 101.1 of the United States District Court for the District of New

Jersey and Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District

of New Jersey, the undersigned hereby seeks entry of order granting the admission pro hac vice of

Richard P Schroeter Jr., Esq., of the law firm of Stark & Knoll Co. L.P.A., to represent Defendant

Foundations Worldwide, Inc. before this Court in connection with the above captioned adversary.

In support of this application, the undersigned submits the attached Certification of Richard

P. Schroeter Jr. and requests that the proposed form order submitted herewith be entered. The

undersigned certifies that she is admitted, practicing, and a member in good standing with the bar

of the State of New Jersey and is admitted to practice before the United States District Court for

the District of New Jersey.

Dated: June 17, 2024

Respectfully submitted,

CIPRIANI & WERNER P.C.

s/ Patricia W. Holden

Patricia W. Holden (NJ# 029011989)

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CERTIFICATION OF FILING/SERVICE

I, Patricia W. Holden, do hereby certify that the within Motion for Pro Hac Vice admission and all supporting documents was/were filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey and was served on all counsel of record this 17th day of June, 2024 through the Court's electronic filing system. I certify that the foregoing statement is true. I am aware that if the foregoing statement is willfully false, I am subject to punishment.

Respectfully submitted,

CIPRIANI & WERNER P.C.

s/ Patricia W. Holden
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Counsel for Foundations Worldwide, Inc.

Dated: June 17, 2024